

# EXHIBIT 2

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**From:** Bender, Kristin <KBender@willkie.com>  
**Sent:** Friday, April 18, 2025 3:26 PM  
**To:** Roeser, Stephanie; Pohlman, Daniel J.; Kevin A. Fritz  
**Cc:** Breed, Maxwell; Dougherty, Megan; Taustine, Melissa; Adams-Jack, Autumn  
**Subject:** RE: Subpoenas

Dan, all,

Thank you for taking the time to further meet and confer regarding Ms. Case and Ms. Koslow's subpoenas on Tuesday, April 15. We understand from that discussion that RFPs 11-13 are acceptable, that RFPs 8-9 are likely acceptable, and that our modifications as proposed on April 3 seem to be more acceptable to your clients, but that you continue to be concerned in general terms as to the burden posed as to certain of the requests. You specifically mentioned excluding Ms. Jones in connection with the requests. You also clarified with respect to the objections raised in your clients' R&Os that your clients may not stand on confidentiality objections to avoid production, and we ask that if that is ultimately at issue, you provide notice as to the same. Further, you clarified that for objections to entity definitions (such as Objection 13), the definition will not be overly narrowly construed. We understand that to mean that references to entities in the request will not be viewed to exclude officers, directors, employees, associates, or partners, but will exclude corporate parents, subsidiaries, and affiliates. We also understand that you are more willing to produce discovery on an earlier timeframe, the narrower the requests are. Let us know if any of that does not align with your recollection or understanding.

In the interest of our continuing effort to minimize any burden on third parties, while also bearing in mind the distinction between burden and undue burden, we have proposed further modifications below. Additionally, you are likely aware that TAG is a party in the consolidated actions. To further reduce any burden to Ms. Case and/or Ms. Koslow, if Ms. Case or Ms. Koslow are currently employed by TAG, we are amenable to an agreement whereby TAG conducts a reasonable search for responsive nonprivileged Documents and Communications of the individual's personal cell phone devices in connection with party discovery. We expect that the Wayfarer Parties should be amenable to this compromise, as they have been attending the meet and confers, apparently in connection with interests associated with the subpoenas, and are obligated to conduct such a search under New York law as having custody and control over such materials. See *Smith v. Pergola 36 LLC*, 2022 WL 17832506, at \*4-5 (S.D.N.Y. Dec. 21, 2022) (Liman, J.) (requiring defendant to search and produce communications from employees' personal devices); *Galvan v. Rolling Lawns, Inc.*, 2025 WL 618558, at \*2 (S.D.N.Y. Feb. 26, 2025) ("[T]he Court finds that Defendants have a discovery obligation to produce all responsive ESI from the personal cell phones of . . . their current employees). Of course, we would need counsel's written agreement in connection with this request (and have added Kevin to the email chain). If TAG's counsel does not agree to do so in writing on this email chain by Tuesday (4/22), we will understand they refuse to do so.

Additional proposed modifications follow, with underlining reflecting modification as of April 3 and bolding reflecting further modifications. We have attempted to address any concern with redundancies as to party discovery while also recognizing that your clients are known to have relevant information relating to the case that will crystallize certain aspects of discovery in this case including the scope of relevant communications with individuals employed by relevant parties:

- **Revise Definition for "Actions" with a definition for "Consolidated Action": "means and collectively refers to the following cases entitled (a) *Lively v. Wayfarer Studios LLC et al.*, U.S. District Court for the Southern District of New York (Case No. 1:24-cv-10049-LJL); and (b) *Wayfarer Studios LLC et al. v. Lively et al.*, U.S. District Court for the Southern District of New York (Case No. 1:25-cv-00449-LJL)."**

- Request 1: Revise to “All Documents and Communications concerning Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, or the Lively/Reynolds Family, excluding Documents and Communications with Baldoni, Heath, Sarowitz, Abel, or Jones.”
- Request 2: Revise to “All Documents and Communications concerning Baldoni, Heath, Wayfarer, or Sarowitz, excluding Documents and Communications with Baldoni, Heath, Sarowitz, Abel, or Jones.”
- Request 4: Revise to “All Documents and Communications concerning Abel, excluding Documents and Communications with Baldoni, Heath, Sarowitz, or Jones.”
- Request 5: Revise to “All Documents and Communications concerning the Film or Marketing Plan with Sony, WME, Jonesworks, TAG, Wallace, Street Relations, any media or Social Media outlet, any cast or crew member of the Film, and any party known to be or identifiable as a director, officer, employee, agent, or contractor thereof.” *(reflecting same modifications as of April 3)*
- Request 6: Revise to “All Documents and Communications concerning the Digital Campaign, excluding Documents and Communications with Baldoni, Heath, Sarowitz, Abel, or Jones.”
- Request 7: Revise to “All Documents and Communications concerning the Consolidated Action, excluding Documents and Communications with Baldoni, Heath, Sarowitz, Abel, or Jones.”
- Request 8: Revise to “All Documents and Communications concerning the Scenario Planning Document, attached as Exhibit D to the Lively Complaint, excluding Documents and Communications with Baldoni, Heath, Sarowitz, or Abel, or Jones.”
- Request 9: Revise to “All Documents and Communications concerning any meeting related to the Scenario Planning Document, attached as Exhibit D to the Lively Complaint, excluding Documents and Communications with Baldoni, Heath, Sarowitz, Abel, or Jones.”

Please advise if these work for you. If not, we are available on Wednesday or Thursday (April 23 or 24) to meet and confer, and we ask that you please let us know a few times that work for you all. On that call, it would be productive to walk through any remaining disputed requests on a request by request basis, as well as what modifications would be acceptable, so that we can understand the continued asserted basis for each and why the proposed modifications are not sufficient.

For those of you who celebrate, wishing you a peaceful Easter.

Best,  
KB

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
[kbender@willkie.com](mailto:kbender@willkie.com) | <vCard> | [www.willkie.com bio](http://www.willkie.com/bio)

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**From:** Roeser, Stephanie <SRoeser@manatt.com>  
**Sent:** Monday, April 14, 2025 8:38 PM  
**To:** Pohlman, Daniel J. <dpohlman@pryorcashman.com>  
**Cc:** Bender, Kristin <KBender@willkie.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Dougherty, Megan <MDougherty@pryorcashman.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>  
**Subject:** RE: Subpoenas

\*\*\* EXTERNAL EMAIL \*\*\*

Thanks, Dan. We'll circulate an invite.

**Stephanie Roeser**

Partner

---

**Manatt, Phelps & Phillips, LLP**

2049 Century Park East

Suite 1700

Los Angeles, CA 90067

**D** (310) 312-4207 **F** (310) 914-5744

SRoeser@manatt.com

**manatt.com**

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**From:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>

**Sent:** Monday, April 14, 2025 5:23 PM

**To:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>

**Cc:** Kristin Bender <[KBender@willkie.com](mailto:KBender@willkie.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Dougherty, Megan <[MDougherty@pryorcashman.com](mailto:MDougherty@pryorcashman.com)>; Melissa Taustine <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Autumn Adams-Jack <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>

**Subject:** Re: Subpoenas

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Hi Stephanie,

I'm available at 1:00 p.m. tomorrow to confer.

Sent from my iPhone

On Apr 14, 2025, at 20:19, Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)> wrote:

Hi Dan,

Following up on the below. Please let us know if you are available to continue these discussions tomorrow between 12-2 EST. We can also look to Thursday (I am tied up in deposition Wednesday).

Thanks,  
Stephanie

**Stephanie Roeser**

Partner

<image001.png>

**Manatt, Phelps & Phillips, LLP**

2049 Century Park East  
Suite 1700  
Los Angeles, CA 90067  
D (310) 312-4207 F (310) 914-5744  
SRoeser@manatt.com

manatt.com

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Thursday, April 10, 2025 12:03 PM  
**To:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Dougherty, Megan <[MDougherty@pryorcashman.com](mailto:MDougherty@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>  
**Subject:** RE: Subpoenas

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Thanks, Dan. How does Tuesday at 1:30-2 pm or 3-5 pm (est) work? We can also provide windows on Monday or Wednesday if needed.

-KB

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
[kbender@willkie.com](mailto:kbender@willkie.com) | [vCard](#) | [www.willkie.com/bio](http://www.willkie.com/bio)

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**From:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Sent:** Thursday, April 10, 2025 2:56 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Dougherty, Megan <[MDougherty@pryorcashman.com](mailto:MDougherty@pryorcashman.com)>  
**Cc:** Stephanie Roeser <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>  
**Subject:** RE: Subpoenas

\*\*\* EXTERNAL EMAIL \*\*\*

Hi Kristin, apologies for the delay.

We have considered your proposed narrowing and think that it makes sense to confer regarding your proposal. I am travelling for work today/tomorrow, but have availability next week (e.g., on Tuesday) for a call.

Best,  
Dan

—  
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Thursday, April 10, 2025 12:12 PM  
**To:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Dougherty, Megan <[MDougherty@pryorcashman.com](mailto:MDougherty@pryorcashman.com)>  
**Cc:** Stephanie Roeser <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>  
**Subject:** RE: Subpoenas

Hi all,

I hope you're well. I'm writing to check in on the status of this subpoena and our proposal outlined below.

Best,  
KB

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
[kbender@willkie.com](mailto:kbender@willkie.com) | [vCard](http://vCard) | [www.willkie.com/bio](http://www.willkie.com/bio)

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Thursday, April 3, 2025 7:46 PM  
**To:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Dougherty, Megan <[MDougherty@pryorcashman.com](mailto:MDougherty@pryorcashman.com)>  
**Cc:** Stephanie Roeser <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>  
**Subject:** RE: Subpoenas

Hi Dan, Max, Megan,

We have further considered the subpoenas issued by Ms. Lively to Ms. Case and Ms. Koslow in connection with our teleconference on March 25. We recall that you framed the conversation in terms of “why us” and “why now” as well as raised a question as to what information, at bottom, these subpoenas are intended to obtain. We did not discuss specific requests in detail, although one or more of the requests for phone records (RFPs 11-13) was identified by you as a request that could be viewed as reasonable.

I have listed below several proposed modifications to address your concerns regarding the timing of party discovery and in an attempt to further lessen any burden on Ms. Case and Ms. Koslow. Please note that with these proposed adjustments, we reserve the right to seek any documents and communications with the Wayfarer Parties (as contemplated in the initial requests) at a later point in time if not otherwise available from the parties themselves.

1. RFP 1: add limitation of “Documents and Communications with Baldoni, Heath, Sarowitz, or Abel need not be produced.”

2. RFPs 2, 4: revise from “with or concerning” to “concerning”
3. RFPs 5-7: add limitation of “with Sony, WME, Jonesworks, TAG, Wallace, Street Relations, any media or Social Media outlet, any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.”

Please let us know if these adjustments resolve your concerns or whether you have additional concerns. We are happy to discuss the proposed modifications and any other issue as useful.

Best,  
Kristin

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
[kbender@willkie.com](mailto:kbender@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

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**From:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Sent:** Monday, March 17, 2025 3:48 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>; Dougherty, Megan <[MDougherty@pryorcashman.com](mailto:MDougherty@pryorcashman.com)>  
**Subject:** RE: Subpoenas

\*\*\* EXTERNAL EMAIL \*\*\*

Kristin,

Please find attached responses and objections to the subpoenas directed to non-parties Katherine Case and Breanna Butler Koslow

Best,  
Dan

—  
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

---

**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Monday, March 3, 2025 1:12 PM  
**To:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>  
**Subject:** RE: Subpoenas

Great, thank you Max, and likewise.

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
[kbender@willkie.com](mailto:kbender@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

**From:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>  
**Sent:** Monday, March 3, 2025 12:56 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>  
**Subject:** RE: Subpoenas

\*\*\* EXTERNAL EMAIL \*\*\*

Kristin:

Exactly the email we were expecting today—we're happy to accept service of both subpoenas and we look forward to working with you on this matter.

Best,

Max

---

**MAXWELL BREED**

Partner

**PRYOR CASHMAN LLP**

7 Times Square, New York, NY 10036-6569

[mbreed@pryorcashman.com](mailto:mbreed@pryorcashman.com)

Direct Tel: 212-326-0113

[www.pryorcashman.com](http://www.pryorcashman.com)

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Monday, March 3, 2025 12:35 PM  
**To:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>  
**Subject:** Subpoenas

Hi Maxwell and Daniel,

We understand from your notices of appearance on Friday, February 28, 2025, that you represent non-parties Katherine Case and Breanna Butler Koslow with respect to Lively v. Wayfarer Studios, 24-cv-10049.

Please advise whether you accept service of the attached subpoenas on behalf of Ms. Case and Ms. Koslow.

Best,  
Kristin

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238



Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
[kbender@willkie.com](mailto:kbender@willkie.com) | <vCard> | [www.willkie.com bio](http://www.willkie.com/bio)

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